

quinn emanuel trial lawyers | new york



February 23, 2022

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *Iowa Pub. Emps.' Ret. Sys. et al. v. Bank of Am. Corp. et al.*, No. 17-cv-6221 (KPF-SLC)

Dear Judge Failla:

Plaintiffs respectfully request leave to file their letter motion regarding discovery directed at JPMorgan with redactions to references to confidential material, pursuant to paragraph 9(c)(ii) of this Court's Individual Rules of Practice.

Plaintiffs request to file their letter motion in redacted form as it contains the names of custodians and deponents, as well as references to materials and documents that have already been, or will be, filed under seal or in redacted form pursuant to sealing orders issued by this Court and have been designated as Highly Confidential or Confidential pursuant to the Protective Order in this case (ECF 150). *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (recognizing that the Court must "balance competing considerations against [the presumption of access]," including but not limited to "the privacy interests of those resisting disclosure") (quoting *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995)).

Respectfully submitted,

/s/ Michael B. Eisenkraft

Michael B. Eisenkraft
COHEN MILSTEIN SELLERS & TOLL
PLLC

/s/ Daniel L. Brockett

Daniel L. Brockett
QUINN EMANUEL URQUHART &
SULLIVAN, LLP